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8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	KENTRELL D. WELCH,	Case No. 2:19-cv-00193-RFB-VCF	
11	Petitioner,	UNOPPOSED MOTION FOR ENLARGEMENT OF TIME	
12	VS.	(FIRST REQUEST)	
13	BRIAN WILLIAMS, et al.,		
14	Respondents.		
15	Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada		
16	hereby respectfully move this Court for an order granting a thirty-one (31) day enlargement of time, to		
17	and including March 7, 2022, in which to file and serve their response.		
18	This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure		
19	and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings, and		
20	other materials on file herein.		
21	There has been no prior enlargement of Respondents' time to file said response, and this motion		
22	is made in good faith and not for the purposes of delay.		
23	RESPECTFULLY SUBMITTED this 4th day of February, 2021.		
24	AARON D. FORD		
25		orney General	
26	By: <u>/s/ Charles L/ Finlayson</u> CHARLES L. FINLAYSON (Bar No. 13685)		
27		Senior Deputy Attorney General	
28			

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2	Attorney General CHARLES L. FINLAYSON (Bar No. 13685) Senior Deputy Attorney General		
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11	Petitioner,	DECLARATION OF COUNSEL	
12	VS.		
13	BRIAN WILLIAMS, et al.,		
14	Respondents.		
15	I, Charles L. Finlayson, hereby state, based on personal knowledge and/or information and belief		
16	that the assertions of this declaration are true:		
17	1. I am a Senior Deputy Attorney C	General of the Post-Conviction Division of the Nevada	
18	Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargemen		
19	of time.		
20	2. My response in this matter is presently due February 4, 2022. By this motion, I am		
21	requesting a 31-day extension of time to file my response, up to and including March 7, 2022.		
22	3. I require additional time to get	up to speed on the complicated issues raised by the	
23	petitioner in his motion. I recently filed responses in <i>McClain v. Williams</i> , 2:17-cv-00753-RFB-NJK; and		
24	Orduna v. Garrett, 20-cv-00641-MMD-CLB. I have also been working diligently to complete responses		
25	in Leonard v. Gittere, 2:99-cv-00360-MMD-DJ, a capital case. In addition, the Ninth Circuit Court o		
26	Appeals recently requested additional briefing in a case by February 17, 2022, and indicated that it was		
27	unlikely to grant any extensions.		
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- 4. My role as a Senior Deputy Attorney General also requires that I take time from my own cases to assign cases, review and edit filings, conduct trainings, and coordinate responses with other departments. These responsibilities, which I cannot delegate, take up a significant portion of my time.
- 5. For the foregoing reasons, I respectfully request that this Court grant this request to extend the time for responding in this matter to March 7, 2022.
- 6. I contacted counsel for the petitioner, and they indicated that they had no objection to my request.

Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the foregoing is true and correct.

By: /s/ Charles L. Finlayson
CHARLES L. FINLAYSON (Bar No. 13685)
Senior Deputy Attorney General

ORDER

IT IS SO ORDERED.

Dated this 8th day of February , 2022.

RICHARD E BOOLWARE, II United States District Court

Case 2:19-cv-00193-RFB-VCF Document 65 Filed 02/08/22 Page 4 of 4 **CERTIFICATE OF SERVICE** I certify that I am an employee of the Office of the Attorney General and that on this 4th day of February, 2022, I served a copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST), by U.S. district court CM/ECF electronic filing to: T. Kenneth Lee Assistant Federal Public Defenders Office 411 East Bonneville Avenue, Suite 250 Las Vegas, NV 89101 Ken lee@fd.org /s/ Perla M. Hernandez